

**EXHIBIT A**

State of Illinois                     )  
  ) ss  
County of St. Clair                )

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Derek Parker, declare under penalty of perjury the following:

At all relevant times, I have been a Special Agent (SA) with the Federal Bureau of Investigations (FBI). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. In March 2020, members of the FBI Southern Illinois Transnational Organized Crime (TOC-West) Task Force, initiated an investigation into the narcotics distribution activities of Charles McGEE, occurring in the Centralia, Illinois area.

2. In October a Confidential Source (CS) was developed. The CS has since made several controlled purchases of cocaine from McGEE.

3. On October 26, 2020, the CS participated in a controlled purchase of approximately \$100 worth of crack cocaine at a residence on Locust Street in Centralia, Illinois. According to the CS, the CS went into the house and purchased the crack cocaine from Charles E. McGEE. The crack cocaine was field tested and tested positive for the presence of cocaine.

4. On December 1, 2020, the CS again purchased \$100 worth of suspected crack cocaine from McGEE at the Locust Street residence. The crack cocaine was field tested and tested positive for the presence of cocaine.

5. On February 11, 2021, a Federal Search Warrant was executed on the residence of McGEE, located on North Locust Street, Centralia, Marion County, Illinois. When Agents

entered the residence McGEE was located in his bed sleeping. In the bed with McGEE, law enforcement located approximately fifty-six grams of suspected cocaine base. The cocaine base was contained within two plastic baggies. A field test was conducted and showed positive for cocaine.

6. Next to McGEE's bed was a nightstand. Inside a nightstand drawer law enforcement located a loaded Hi-Point, M/N C9, 9mm Pistol, bearing serial number P1442095 along with multiple items of mail addressed to McGEE.

7. Law enforcement also located \$2,179.00 in United States Currency inside of a bedroom dresser drawer. Another \$21,000.00 in United States Currency was recovered from inside a shoe box within the bedroom closet.

8. During an interview on February 11, 2021, McGEE admitted that the pistol and the cocaine base belonged to him. McGEE stated that he purchased the pistol off of the street and that he possessed it since someone tried to break into his home. (Law enforcement records reflected an attempted burglary was reported at McGEE's residence on or about September 20, 2020.)

9. McGEE admitted that he sells crack cocaine, otherwise known as cocaine base. McGEE admitted selling cocaine base from his home since moving into the house in approximately 2018. McGEE estimated that he has sold at least an eight ball of crack cocaine each week since 2018.

10. The total amount seized from McGEE's residence was \$23,179.00 in United States Currency.

11. On March 16, 2021, McGEE was indicted in the United States District Court for the Southern District of Illinois with two counts of Conspiracy to Distribute and Possess With

Intent to Distribute a Controlled Substance: Cocaine Base and Possession of a Firearm in Furtherance of a Drug Trafficking Crime in Case No. 21-cr-30034-DWD.

12. The Indictment also contains a Forfeiture Allegation which seeks forfeiture of both the Hi-Point, M/N C9, 9mm Pistol, bearing serial number P1442095 and the \$23,179.00 in United States Currency.

13. Based on the foregoing, declarant believes that the \$23,179.00 in United States Currency is property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. § 801 *et seq.*

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18th day of August, 2021.



DEREK PARKER  
Special Agent  
Federal Bureau of Investigations